
NEVADA NUCLEAR WASTE TASK FORCE, INCORPORATED

Alamo Plaza
4550 W. Oakey Blvd.
Suite 111
Las Vegas, NV 89102
702-248-1127
FAX 702-248-1128
800-227-9809

551400

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Carol Hanlon
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy, M/S 025
P.O. Box 364629
North Las Vegas, NV 89036-8629

Comment on the possible recommendation of the Yucca Mountain site for development as a spent nuclear fuel and high-level radioactive waste geologic repository.

For the past fifteen years the Nevada Nuclear Waste Task Force has been working to promote public involvement in the federal high-level nuclear waste program. The citizens of Nevada are deeply concerned about the impacts that a repository at Yucca Mountain would have on their health, safety, and economic well-being and they have found it difficult or impossible to bring their concerns to decision makers.

The Department of Energy is currently taking comment on a possible Site Recommendation of Yucca Mountain. In the announcements and notices of hearings and other opportunities for comment, the Department references scientific documents—the Science and Engineering Report and the Preliminary Site Suitability Evaluation. Citizens are given the impression that the comments made at this time are to be within the scope of those reports. On the Project website it states: “Currently, the U.S. Department of Energy is soliciting public and stakeholder comments on the scientific and technical information that will be considered in potential site suitability and site recommendation decisions.”¹ This statement has caused frustration for many people who wish to comment. *Site Recommendation* is a misnomer because the Secretary’s decision to develop Yucca Mountain as a national repository initiates a project that would have impacts and consequences well beyond the site.

The recommendation of the Yucca Mountain site by the Department of Energy, according to the Nuclear Waste Policy Act as Amended, involves many more decisions than those analyzed in the recently released documents mentioned above. The people of Nevada and citizens

¹ The Task Force notes that the Project makes a clear distinction between *stakeholders* and *the public*. We have urged the DOE not to use the word *stakeholder* without defining who it is.

nationwide have demanded that the Department do a complete and comprehensive analysis of the transportation of irradiated fuel and high-level nuclear waste from the point of generation to Yucca Mountain. This has never been done. In light of the terrorist attacks that occurred in September 2001, the public believes that consideration of this aspect of the project is even more important than it was previously thought to be.

A report recently released by the Project on Government Oversight showed, not only that security was lax at DOE weapons production facilities, but also that "the Energy Department's transportation security division, which moves nuclear weapons as well as plutonium and weapons-grade uranium along highways, was 'defeated' in six of seven exercises in December 1998. The DOE security force failed to protect nuclear cargo because they had inadequate weapons and insufficient number as well as poorly conceived tactics." Until the Department can demonstrate that all of the problems cited in this report have been corrected, surely a project like Yucca Mountain cannot be considered.

The Nevada Nuclear Waste Task Force recommends that the Secretary of Energy use this comment period, which ends on October 19, 2001, only to evaluate public comment that is submitted addressing the recently released scientific documents since the Project's website and advertisements state that such is the purpose. When all work has been completed on **all** aspects of the project, national hearings and a public comment period of adequate length must be scheduled to receive public comment regarding whether or not the project should be allowed to proceed.

Sincerely,

A handwritten signature in cursive script, reading "Judy Treichel". The signature is written in dark ink and is positioned above the printed name and title.

Judy Treichel
Executive Director